

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

WILLIE STRICKLAND, #226537.	)	
	)	
Plaintiff,	)	
	)	
v.	)	CV NO. 2:05-CV-931-F
	)	
SAMUEL RAYAPATI, et. al.,	)	
	)	
Defendants.	)	

ANSWER

Come now, the defendant, **J.C. Giles** by and through the Attorney General for the State of Alabama, Honorable Troy King, and hereby file this Answer in the above-styled case stating as follows:

1. Defendant denies all allegations not expressly admitted herein.
2. Defendant asserts that the plaintiff has failed to state a claim upon which relief can be granted.
3. Defendant asserts that the plaintiff's claims are frivolous.
4. Defendant denies that any of the plaintiff's Constitutional rights have been violated.
5. Defendant pleads the affirmative defenses of qualified and absolute immunity.
6. Defendant asserts that the plaintiff has failed to show there is any genuine issue of the material facts of this case, and the defendant is entitled to judgment as a matter of law.

Respectfully submitted,

TROY KING  
ATTORNEY GENERAL

\_\_\_\_\_/s/ MATTHEW Y. BEAM\_\_\_\_\_  
MATTHEW Y. BEAM (BEA065)  
ASSISTANT ATTORNEY GENERAL

**ADDRESS OF COUNSEL**

Office of the Attorney General  
General Civil Litigation  
11 South Union Street  
Montgomery, Alabama 36130  
(334) 242-7340  
(334) 242-2433 fax

**CERTIFICATE OF SERVICE**

I hereby certify that this 28<sup>th</sup> day of November, 2005 served a copy of the foregoing on the plaintiff by placing same in the United States mail, postage prepaid and addressed as follows:

Mr. Willie Strickland  
AIS 226537  
Ventress Correctional Facility  
P.O. Box 767  
Clayton, Alabama 36016-0767

\_\_\_\_\_/s/ MATTHEW Y. BEAM\_\_\_\_\_  
MATTHEW Y. BEAM (BEA065)  
ASSISTANT ATTORNEY GENERAL